

KRASKIN, LESSE & COSSON, LLP  
ATTORNEYS AT LAW  
TELECOMMUNICATIONS MANAGEMENT CONSULTANTS

2120 L Street, N.W., Suite 520  
Washington, D.C. 20037

Telephone (202) 296-8890  
Telecopier (202) 296-8893

DOCKET FILE COPY ORIGINAL

June 11, 1999

Mr. William M. Newman  
PNR  
101 Greenwood Avenue, Suite 502  
Jenkintown, PA 19046

Re: Request for Surrogate Data

Dear Mr. Newman:

RECEIVED  
JUN 11 1999  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

We understand that PNR has agreed to provide the road surrogate data developed by PNR required to validate the FCC's cost proxy model for universal service. We understand that the cost of the data is \$25 each for two CDs, for a total \$50.00. We also understand, as described further below, that there are clear limits on the use of this data, and that we must execute and comply with the provisions of the Common Carrier Bureau's protective order entered in this proceeding (*In the Matter of Federal-State Joint Board on Universal Service, CC Docket No. 96-45/Forward-Looking Mechanism for High Cost Support for Non-Rural LECs, CC Docket No. 97-160*, rel. July 27, 1998) (the "Protective Order").

Pursuant to paragraph 3.a(2) of the Protective Order, and on behalf of Cross Telephone Company, I have requested the expert advice of Mr. John Harris for the purpose of formulating filings in this proceeding. This undertaking requires access to the data your company will provide. Mr. Harris, an employee of Harris, Skrivan & Associates, LLC, provides cost study consulting services to Cross Telephone Company; his declaration is enclosed. My declaration is also enclosed. Any other individuals who subsequently require access to these data will also sign declarations, which will be filed as required, and such filing will constitute notice that I have requested advice from those individuals.

Please be advised that the named representatives of Cross Telephone Company will fully protect the data that PNR designates as confidential pursuant to the requirements of the Protective Order. That data will be used to attempt to run and validate the FCC's cost proxy model. Cross Telephone does not consider the output it derives from running that model to be proprietary. That output will not include any of the data received from PNR, nor will it allow a third party to derive that data. Accordingly, Cross Telephone reserves the right to use the output it derives from the model in pleadings and other communications filed publicly with the FCC and other regulatory agencies, and


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Mr. Newman  
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in other public statements and releases.

Please let me know if you have any questions.

Very truly yours,



Sylvia Lesse

Enclosures

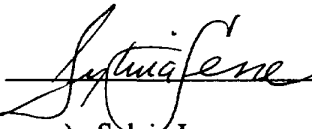
cc: Magalie Roman Salas  
Katie King

## DECLARATION

In the Matter of

**Federal State Joint Board on Universal Service, Forward-Looking Mechanism for High Cost Support for Non-Rural LECs (CC Docket Nos. 96-45, 97-160)**

I, Sylvia Lesse, hereby declare under penalty of perjury that I have read the Protective Order that has been entered by the Common Carrier Bureau in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Common Carrier Bureau. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

(signed)   
(printed name) Sylvia Lesse

(representing) Cross Telephone Company

(title) Attorney

(employer) Kraskin, Lesse & Cosson, LLP

(address) 2120 L Street, N.W., Suite 520  
Washington, D.C. 20037

(phone) (202) 296-8890

(date) June 11, 1999

**DECLARATION****In the Matter of**

**Federal State Joint Board on Universal Service, Forward-Looking Mechanism for High Cost Support for Non-Rural LECs (CC Docket Nos. 96-45, 97-160)"**

I, John P. Harris, hereby declare under penalty of perjury that I have read the Protective Order that has been entered by the Common Carrier Bureau in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Common Carrier Bureau. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

(signed) John P. Harris

(printed name) John P. Harris

(representing) Cross Telephone Company

(title) Manager

(employer) Harris, Skrivan & Associates, LLC

(address) 8801 South Yale, Suite 450  
Tulsa, OK 74137

(phone) (918) 496-1444

(date) June 11, 1999

**KRASKIN, LESSE & COSSON, LLP**  
PAYABLES  
2120 L STREET, N.W. SUITE 520  
WASHINGTON, DC 20037

**THE RIGGS NATIONAL BANK**  
OF WASHINGTON, DC  
WASHINGTON, DC 20074  
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June 11, 1999

PAY TO THE  
ORDER OF PNR

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DOLLARS

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MEMO Request for Surrogate Data

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*Sylvia J. Fene*

MP